

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	Criminal No. 1:13CR350
)	
v.)	The Honorable Leonie M. Brinkema
)	
THADDAEUS SNOW,)	
)	
a/k/a "Storm" et. al.)	
Defendants.)	Hearing Date: December 13, 2013

UNITED STATES' MOTION TO SEVER DEFENDANTS FOR SEPARATE TRIALS

The United States of America, by and through Dana J. Boente, the Acting United States Attorney for the Eastern District of Virginia, and the undersigned Assistant United States Attorneys, files this Motion to Sever Defendants for Separate Trials as follows:

Introduction

The superseding indictment charges twenty-four defendants with numerous violations, including Conspiracy to Violate the Racketeer Influenced and Corrupt Organizations Act (RICO), in violation of 18 U.S.C. § 1962(d), Violent Crimes in Aid of Racketeering, in violation of 18 U.S.C. § 1959(a)(6), Conspiracy to Engage Drug Trafficking in violation of 21 U.S.C. § 841 and 846, and Sex Trafficking in violation of 18 U.S.C § 1594(c), among other charges. All of the defendants and unindicted co-conspirators are connected by their affiliation with the Nine Trey Gangster ("NTG") set of the United Blood Nation ("Bloods"), and their criminal conduct connected with that organization is set forth in the pending superseding indictment.

As of the filing of this motion, 11 defendants remain scheduled for trial on February 11, 2014. In order to facilitate the interests of justice, considering this Court's ability to reasonably

and efficiently accommodate a number of defendants at trial, and to provide each of the defendants with the most expedient opportunity to get their day in court, the United States is requesting severance of this case as to the Racketeering and related offenses into two separate trials for the reasons set forth below.

Request for Severance

Although all 11 remaining defendants are properly joined, conducting a single jury trial with all 11 defendants and their attorneys is not realistic and would unduly burden this Court's resources to the detriment of all parties and the interests of justice. Thus, the interests of justice and judicial economy warrant a severance of this case into two separate trials regarding the Racketeering and related offenses. The current posture of this case warrants an appropriate severance under Federal Rule of Criminal Procedure 14. The United States has evaluated the evidence and each defendant's role in the scheme to develop the following proposed division of defendants:

Trial # 1 (February 11, 2014)	Trial # 2 (March 11, 2014)¹
THADDAEUS SNOW (1,2,5,8,9,10,11)	STEPHON GREENE (5,9)
WILLIAM SYKES (1,2,3,4,5,9)	LATONYA SNOW (9)
GEORGE WILLIAMS (1,3,4,5,9)	JAMEEL ALEEM (5)
JAMES WATSON (1,5,9)	DEYONKA GASKINS (5)
DEVANTE JORDAN (10,11,12,13)	GRACIER ISIQUE (5)
	JOSHUA PENDLETON BROOKS (5) ²

¹ March 11, 2014 is a proposed date by the government. Naturally, the proposed date for Trial #2 must be consistent with the Court's schedule.

² Mr. Brooks was apprehended by the United States Marshals Service on December 3, 2013. He will make his initial

This division is based on the United States' careful assessment of each defendant's connections with one another, as well as particular criminal events that will be covered by the government's evidence. Although there will undoubtedly be overlapping evidence between these trials, the United States believes that the proposed divisions will allow the cases to move as quickly as possible and result in the most effective use of this Court's resources.

The government estimates that Trial #1 one will take approximately two weeks to conclude. Trial #2 will take approximately 3 days to conclude. At trial, the United States will present evidence from numerous witnesses outlining the structure, operation, and membership of the Bloods enterprise and focus extensively on the criminal acts connected to each of the defendants and their conspirators.

Because of these coordination issues, the United States respectfully requests that the proposed defendants for Trial #1 proceed as planned on February 11, 2014. The remaining defendants in Trial #2 can be scheduled for a second trial date to begin on or after March 11, 2014, allowing the United States to effectively coordinate witness and exhibit issues between the cases and to avoid unnecessary delays in either case due to the unavailability of witnesses or exhibits. In making this recommendation, we ask the Court to consider that witnesses in the first trial will be subject to cross-examination by five attorneys, which could slow the pace of the first trial.

Conclusion

For the above reasons, the United States respectfully requests that this case be severed in the manner proposed above to promote the interests of justice and judicial economy.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of December, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

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